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January 10, 2014

Stephen B. Seiple, Asst. General Counsel
Columbia Gas of Kentucky, Inc.
200 Civic Center Drive
P.O. Box 117
Columbus, OH 43216-0117

Richard S. Taylor
225 Capital Avenue
Frankfort, KY 40601

Re: Columbia Gas of Kentucky, Inc.
Petition for Confidential Protection received November 26, 2013
PSC Reference Case No. 2004-00462 and Case No. 2010-00365

Gentlemen:

The Public Service Commission has received the Petition for Confidential Treatment you filed on November 26, 2013,¹ on behalf of Columbia Gas of Kentucky, Inc. ("Movant") to protect certain information filed with the Commission as confidential pursuant to 807 KAR 5:001, Section 13.² As your request was submitted outside of a case, 807 KAR 5:001(13)(3) provides that the Commission's "executive director, as official custodian of the commission's records, shall determine if the material falls within the exclusions from disclosure requirements established in KRS 61.878 and the time period for which the material should be considered as confidential and shall advise the requestor of the determi-

¹ Letter from Judy M. Cooper, Director, Regulatory Policy, Columbia Gas of Kentucky, Inc., to Jeff Derouen, Executive Director, Public Service Commission (Nov. 26, 2013) attached to Columbia Gas of Kentucky, Inc.'s ("Movant's") Petition for Confidential Treatment of Movant's Final Hedging Report ("Petition") for the 2013-2014 heating season. This letter references Case No. 2010-00365, *Application of Columbia Gas of Kentucky, Inc. to Extend Its Gas Price Hedging Plan* (Ky. PSC filed Sept. 10, 2010) as well as Case No. 2004-00462, *Application of Columbia Gas of Kentucky, Inc. to Implement a New Small Volume Gas Transportation Service, A Gas Price Hedging Plan, An Off-System Sales and Capacity Release Revenue Sharing Mechanism, and Gas Cost Incentive Mechanism* (Ky. PSC filed Nov. 30, 2004), which is cited as the case style of the current Petition.

² Although the Petition for Confidential Treatment was filed pursuant to 807 KAR 5:001, Section 7, this regulation was amended as of Jan. 4, 2013, and the confidential material section is now contained in Section 13.

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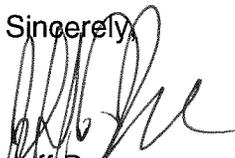
nation by letter.” This letter constitutes my determination of your request.

The information you seek to have treated as confidential is identified as being Movant’s Final Hedging Report for the 2013-2014 heating season. The information is described as containing sensitive pricing information and confidential information about Movant’s hedging strategies. Movant states that under its Gas Price Hedging Plan (“Plan”), a historically based Benchmark Price is derived from winter period price information, Trigger Prices are then determined based on the Benchmark Price, and each Trigger Price has a specified quantity of Movant’s winter gas purchase requirements associated with it.

Movant states that the Trigger Price information is confidential and proprietary, and, is not disclosed to the public. Movant further states that if publicly disclosed this information would damage Movant’s competitive position and business interests by providing competitors and financial traders with information that would enable them to determine the timing and approximate volume of Movant’s hedging activity. This information in turn might enable them to take financial positions based on that knowledge to the detriment of Movant’s ability to obtain the lowest cost gas for its customers and its ability to compete for customers.

Based on a review of the information and pursuant to KRS 61.878 and 807 KAR 5:001, Section 13, the Commission has determined that disclosure of the information requested to be held confidential would permit an unfair commercial advantage to Atmos’ competitors. Therefore, the information requested to be treated as confidential meets the criteria for confidential protection and will be maintained as a non-public part of the Commission’s Post Case Referenced Correspondence file for an indefinite period.

The procedure for usage of confidential materials during formal proceedings may be found at 807 KAR 5:001, Section 13(9). If the information becomes publicly available or no longer warrants confidential treatment, Atmos is required by 807 KAR 5:001, Section 13(10), to inform the Commission so that the information may be placed in the public record.

Sincerely,

Jeff Derouen
Executive Director

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